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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SARAH ANDERSON,
FABIAN GOMEZ,
WILLIAM OWEN,
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-CR-147-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: October 27, 2025
TIME: 10:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on October 27, 2025.
2. By this stipulation, defendants¹ now move to continue the status conference until **January 12, 2026 at 10:00 a.m.**, and to exclude time between October 27, 2025, and January 12, 2026, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

¹ Defendants Wendy Labuda and Epifanio Ramirez do not join in this stipulation. Wendy Labuda entered a guilty plea on July 21, 2025 (ECF No. 181). Epifanio Ramirez entered an open plea to three of the four counts with which he is charged. ECF No. 195. The Court set a trial date of December 9, 2025, for the remaining count, for Mr. Ramirez only. ECF No. 198

1 3. The parties agree and stipulate, and request that the Court find the following:

2 a) The government has produced discovery in this matter, consisting of over 1,300
3 pages of investigative reports and photographs, including arrest reports, DEA reports, and other
4 supporting documents. The government has also made available to the defense for viewing at the
5 U.S. Attorney's Office, by appointment, hours of video surveillance evidence for multiple
6 controlled drug buys in the underlying investigation.

7 b) Defense counsel desire additional time to conduct investigation into the charges,
8 the alleged roles of their respective clients, and to review discovery in this case, including
9 watching the video evidence the government has made available. Defense counsel will need
10 additional time to discuss potential resolutions with their clients, prepare pretrial motions, and
11 otherwise prepare for trial.

12 c) In addition, defense counsel Philippa Lauben has recently substituted in as
13 counsel for Sarah Anderson. She will need additional time to get up to speed on this matter and
14 to discuss the case with her client.

15 d) Counsel for defendants believe that failure to grant the above-requested
16 continuance would deny them the reasonable time necessary for effective preparation, taking into
17 account the exercise of due diligence.

18 e) The government does not object to the continuance.

19 f) Based on the above-stated findings, the ends of justice served by continuing the
20 case as requested outweigh the interest of the public and the defendant in a trial within the
21 original date prescribed by the Speedy Trial Act.

22 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
23 et seq., within which trial must commence, the time period of October 27, 2025 to January 12,
24 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
25 T4] because it results from a continuance granted by the Court at defendant's request on the basis
26 of the Court's finding that the ends of justice served by taking such action outweigh the best
27 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: October 22, 2025

ERIC GRANT
United States Attorney

/s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney

Dated: October 22, 2025

/s/ PHILIPPA LAUBEN
PHILIPPA LAUBEN
Counsel for Defendant
SARAH ANDERSON

Dated: October 22, 2025

/s/ DAVID D. FISCHER
DAVID D. FISCHER
Counsel for Defendant
FABIAN GOMEZ

Dated: October 22, 2025

/s/ JOHN R. MANNING
JOHN R. MANNING
Counsel for Defendant
WILLIAM OWEN


Dated: October 22, 2025

/s/ TAMARA SOLOMAN
TAMARA SOLOMAN
Counsel for Defendant
JOALEEN ROGERS

ORDER

IT IS SO FOUND AND ORDERED.

Dated: October 27, 2025


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE